

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

Jessica Jade Dunn
Jessica NMN Bergo,

Debtor.

BKY NO. 04-32035 GFK

Travis D. Dunn,

Plaintiff,

ADV. NO. 04-3278

v.

Jessica Jade Dunn,

Defendant.

REPLY TO COUNTER-CLAIM

Plaintiff, Travis D. Dunn, for his Reply to Defendant's Counter-claim, states and alleges as follows:

1. Except as hereinafter specifically admitted, qualified or otherwise explained, Plaintiff denies each and every allegation contained in Defendant's Counter-claim.
2. Plaintiff is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs II, III, and IV of the Counter-claim.
3. Plaintiff denies the allegations in paragraphs V, VI, VII, VIII, IX, X, XI and the Wherefore clause of the Counter-claim.
4. Plaintiff admits the allegations in paragraph I of the Counter-claim.

AFFIRMATIVE DEFENSES

1. The within action is barred by the doctrines of waiver, release and/or estoppel.
2. Defendant has failed to state a cause of action for which relief can be granted.

WHEREFORE, the Plaintiff prays that the Defendant take nothing by its pretended cause of action set forth in the Counter-claim and that Plaintiff be awarded his costs and disbursements herein including his costs and reasonable attorney fees, if any.

Dated: 7-13-04

Travis D. Dunn
Travis D. Dunn, Pro Se
457 Short Street
P.O. Box 102
Mazeppa, MN 55956
(507) 843-2305

State of Minnesota)
) ss.
County of Goodhue)

VERIFICATION

The undersigned, Travis D. Dunn, Plaintiff herein, and being duly sworn, states that he has read the above and foregoing Reply to Counter-claim, and the statements therein are true and to the best of his knowledge, information, and belief.

Travis D. Dunn
Travis D. Dunn

Subscribed and sworn to before me this
13th day of July, 2004.

Shianne G. Bruegger
Notary Public



Form 9001-1 - Unsworn Certificate Of Service

UNSWORN CERTIFICATE OF SERVICE

I, Travis Dunn, declare under penalty of perjury that on 7-14-04 I mailed
copies of the foregoing Reply to Counterclaim (or copies of the attached _____) by first
class mail postage prepaid to each entity named below at the address stated below for
each entity:

Jessica Jade Dunn
508 Center Street Apt A.
Decorah, Iowa 52101
(state name and address for each entity served)

Steven Carson
P.O. Box 65
Preston, MN 55965

Executed on: 7-14-04

Signed: [Signature]

Name and Address of Subscriber

Travis Dunn
P.O. Box 102 457 Short St. Mazeppa, MN 55956

[Note - This format can be the last item in a paper ("copies of the foregoing ____"). For
example, see Local Form 1075-1. When using this format as a separate paper ("copies of
the attached ____"), also use the caption shown in Local Form 1007-1.]

LOCAL RULE REFERENCE: 9001-1

TRAVIS DANIEL DUNN
457 SHORT ST.
P.O. BOX 102
MAZEPPA, MN 55956

07-14-2004

U.S. BANKRUPTCY COURT
U.S. COURTHOUSE RM 200
316 N ROBERT ST
ST. PAUL, MN 55101

IN RE: TRAVIS DANIEL DUNN
vs. JESSICA JADE DUNN
CASE NUMBER: 04-32035-GFK
ADVERSARY COMPLAINT NUMBER: 04-3278

To Whom it may Concern:

Enclosed is Certificate of Service for the above notice as
Reply to Counter-claim.

Sincerely,


Travis Dunn